

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

FTE NETWORKS, INC.	:	
	:	
	:	
Plaintiff,	:	
	:	
v.	:	Case No. 1:22-cv-00785-MN
	:	
ALEXANDER SZKARADEK, et al.	:	
	:	
Defendants.	:	
	:	

AFFIDAVIT OF FRANK FORELLE

I, Frank Forelle, hereby state and affirm as follows:

1. I am over the age of eighteen (18) years and competent to testify.
2. The following is based upon my personal knowledge.
3. At all times relevant to this action, I have been the Chief Executive Officer of the First Capital Real Estate Trust, Inc. ("FC REIT").
4. Since the time I became the Chief Executive Officer of FC REIT, FC REIT has not conducted any business in Delaware.
5. FC REIT is currently engaged in the ordinary tasks required to liquidate and wind up its affairs.
6. In a teleconference in November of 2021, the Board of FC REIT authorized me to pursue the shares at issue in this litigation.
7. The shares in question are an asset of the FC REIT and in order to pursue them, intervention in this action was necessary.

8. Consequently, the Board authorized the intervention in the Delaware action for the purpose of managing the assets of the FC REIT while winding up its affairs.

I SOLEMNLY AFFIRM under the penalties of perjury that the contents of the foregoing Affidavit are true and correct.

Aug 3, 2022
Date

Frank Forelle
Frank Forelle